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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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October 5, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

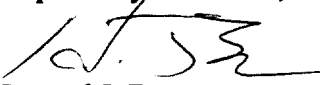
Re: AMNET US - Supplement to Request for Waiver
ET Docket 98-237
For Modification to Satellite Earth Station E000354
Coral Springs, FL

Dear Ms. Salas:

Transmitted herewith on behalf of AMNET US, is an original and four (4) copies of a Supplement to Request for Waiver of the Commission's Rules restricting construction and operation of fixed satellite earth stations in the 3650-3700 MHz band. AMNET is seeking a waiver in connection with its contemporaneously filed application for modification of satellite earth station E000354 seeking authority to operate in the extended C-Band for downlink into the United States. A copy of that application is attached to this Request for Waiver.

Should any questions arise in connection with this application, kindly communicate directly with the undersigned.

Respectfully submitted,


Howard J. Barr
Counsel

Enclosure

cc: Ms. Sylvia Lam (Room TW A-325)
Mr. Julius P. Knapp (OET - Room 7-B133)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

OCT 5 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amendment of the Commission's)
Rules with Regard to the 3650-3700 MHz)
Government Transfer Band,)
ET Docket 98-237, Notice of Proposed)
Rulemaking and Order)

SUPPLEMENT TO REQUEST FOR WAIVER

Amnet US, by counsel, hereby respectfully supplements its request for a waiver of the Commission's rules restricting construction and operation of fixed satellite earth stations in the 3650-3700 MHz band (the "extended C-Band"). Amnet submits that, with the additional information provided in this Supplement to Waiver Request, the Commission can confidently grant the requested waiver in the public interest. The following is shown in support thereof:

NEED FOR THE WAIVER

As discussed in the waiver request, Amnet seeks to operate a downlink in the extended C-band with an earth station antenna at Coral Springs, Florida. Except for grandfathered earth stations operating in the extended C-band (3650-3700 MHz) and earth stations operating 10 miles or less from a grandfathered site, the Commission has frozen licensing of earth stations in the 3650-3700 MHz spectrum band due to its desire to allocate that spectrum band to the fixed terrestrial service ("FTS") on a primary basis. *See Amendment of the Commission's Rules with Regard to the 3650-3700 MHz*

Government Transfer Band, ET Docket 98-237, *Memorandum Opinion and Order*, FCC 00-181 (adopted May 17, 2000) (the "*Relief Order*").

As discussed in the waiver request, the Coral Springs earth station is located approximately 22 miles from an existing grandfathered earth station located at Miramar, Florida. As a result, Amnet is not entitled to the relief provided by the *Relief Order*. Accordingly, Amnet requested an appropriate waiver in connection with the filing of its application for authority to operate the earth station in the extended C-band.

In further support of its waiver request, Amnet submits that it should be possible to shield the earth station antenna so that the interference characteristics of its receive earth station operations at Coral Springs, Florida appear no different than if Amnet's earth station were located 10 miles or less from a grandfathered site.

To that end, Amnet submits that it will work within the guidelines and recommendations set forth by ITU S7 and ITU Working Group 4A (Review of S7 and PP98 resolutions), Appendix S7 to the Radio Regulations dealing with the method for determining the coordination area around an earth station in frequency bands shared among space and terrestrial radiocommunication services and guidelines and specifications set forth by the National Spectrum Managers Association (NSMA), Working Group 6 Earth Station Shielding REP.WG6.89.004.

Shielding materials and components of the shielding system (if necessary) will be installed in accordance with the procedures that are particular to the facility being shielded (as set forth above), the degree of shielding effectiveness to be achieved, the special materials being employed, and the environmental conditions in which the system will be operating. If necessary, fiber attenuation composites, coating suspensions and/or

more traditional techniques such as Rf absorbent mesh, berms and conductive paints, can yield attenuations that will be adequate for preventing undesirable penetration by electromagnetically interfering RF signals from a FTS transmitter(s).

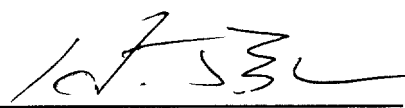
If and when there exists a fixed terrestrial user whose use of a transmitter in the 3650-3700 MHz band interferes with the operation of Amnet's downlink in the extended C-band at Coral Springs, Florida, Amnet will shield its antenna so that the interference characteristics of its receive earth station operations at Coral Springs, Florida appear no different than if Amnet's earth station were located 10 miles or less from a grandfathered site.

CONCLUSION

Wherefore, the premises considered, Amnet respectfully requests prompt action by the Commission on its waiver request and the underlying application for authority to operate in the extended C-Band.

Respectfully submitted,

AMNET US

By: 
Howard J. Barr
Its Counsel

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